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Acting Under Authority Conferred by 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 18-577 CRB
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	
v.)	
)	
MICHAEL RICHARD LYNCH AND)	
STEPHEN KEITH CHAMBERLAIN,)	
)	
Defendants.)	

STIPULATION

WHEREAS, the following motions are presently set for hearing on November 8, 2023:

- ECF No. 217: Defendant Stephen Chamberlain's Motion to Dismiss Counts One Through Fifteen and Count Seventeen as Time-Barred and for Preindictment Delay
- ECF No. 218: Defendant Michael Richard Lynch's Motion to Dismiss Counts One Through Sixteen of the Superseding Indictment
- ECF No. 219: Defendant Michael Richard Lynch's Motion to Dismiss Count Seventeen of the Superseding Indictment

- ECF No. 220: Defendant Stephen Chamberlain’s Motion to Compel the Government to Secure the Trial Attendance of Rob Knight or, in the Alternative, to Issue a Rule 15 Order for Deposition
- ECF No. 221: Defendant Michael Richard Lynch’s Motion 1) to Dismiss Counts One Through Sixteen, and Certain Objects of Count Seventeen, of the Superseding Indictment as Time-Barred and 2) for Discovery
- ECF No. 222: Defendant Stephen Chamberlain’s Joinder and Motion to Dismiss Count 17 of the Superseding Indictment
- ECF No. 223: Defendant Stephen Chamberlain’s Joinder in Defendant Michael Lynch’s Motion to Dismiss Counts One Through Sixteen
- ECF No. 224: United States’ Motion for Foreign Depositions Under Rule 15 of the Federal Rules of Criminal Procedure
- ECF No. 229: Defendant Michael Richard Lynch’s Joinder in Defendant Stephen Chamberlain’s Motion to Dismiss Counts One Through Fifteen and Count Seventeen as Time-Barred and for Preindictment Delay.

WHEREAS, in order to accommodate scheduling conflicts of the parties and to maintain the current pretrial schedule, the parties have met and conferred and respectfully request that the Court calendar ECF Nos. 220 and 224 for November 3, 2023, and the remaining motions for November 29, 2023;

WHEREAS, the parties further believe that a brief extension of time, to October 24, 2023, to file reply briefs to the pending motions is appropriate;

THEREFORE, the parties, through their counsel and subject to the Court’s approval, respectfully request that the hearing on ECF Nos. 220 and 224 be continued to November 3, 2023, at 10 a.m. by Zoom; that the hearing on ECF Nos. 217, 218, 219, 221, 222, 223, and 229 be continued November 29, 2023, at 1:30 in person; and that the deadline to file reply briefs with respect to ECF Nos. 217, 218, 219, 220, 221, 222, 223, 224, and 229 be continued to October 24, 2023.

IT IS SO STIPULATED.

1 DATED: October 18, 2023

PATRICK D. ROBBINS
Attorney for the United States Attorney
Acting Under Authority Conferred by
28 U.S.C. § 515

4 By: /s/

ROBERT S. LEACH
ADAM A. REEVES
Assistant United States Attorneys

7 DATED: October 18, 2023

STEPTOE & JOHNSON LLP

9 By: /s/

REID H. WEINGARTEN
JONATHAN MATTHEW BAUM
BRIAN M. HEBERLIG
MICHELLE L. LEVIN
NICHOLAS PAUL SILVERMAN
Attorneys for Defendant
Michael Richard Lynch

14 DATED: October 18, 2023

CLIFFORD CHANCE US LLP

16 By: /s/

CHRISTOPHER J. MORVILLO
CELESTE KOELEVELD
DANIEL SILVER
Attorneys for Defendant
Michael Richard Lynch

20 DATED: October 18, 2023

BIRD, MARELLA, BOXER, WOLPERT, NESSIM,
DROOKS, LINCENBERG & RHOW, P.C.

22 By: /s/

GARY S. LINCENBERG
RAY S. SEILIE
MICHAEL C. LANDMAN
Attorneys for Defendant Stephen Keith Chamberlain

[PROPOSED] ORDER

Pursuant to stipulation and good cause shown, the Court ORDERS that the hearing on ECF Nos. 220 and 224 be continued to November 3, 2023, at 10 a.m. by Zoom; that the hearing on ECF Nos. 217, 218, 219, 221, 222, 223, and 229 be continued to November 29, 2023, at 1:30 p.m. in person; and that the deadline to file reply briefs with respect to ECF Nos. 217, 218, 219, 220, 221, 222, 223, 224, and 229 be continued to October 24, 2023.

IT IS SO ORDERED.

Date:

THE HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE